

Niyati Shah (NJ Bar No. 026622005)

Noah Baron*

Asian Americans Advancing Justice | AAJC

1620 L Street NW, Suite 1050

Washington, DC 20036

202-868-0396

nshah@advancingjustice-aajc.org

nbaron@advancingjustice-aajc.org

* Pro hac vice application pending

Attorneys for Proposed Amici Curiae

Asian American Legal Defense and Education Fund,

AAPI New Jersey, and

Asian Americans Advancing Justice / AAJC

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

)
ANDY KIM, in his personal capacity as a) Civ. No. 24-1098 (ZNQ) (TJB)
candidate for U.S. Senate, et al.,)
)
Plaintiffs,)
)
v.)
CHRISTINE GIORDANO HANLON,)
in her official capacity)
as Monmouth County Clerk, et al.,)
)
Defendants.)
)
)

**DECLARATION OF
NIYATI SHAH IN SUPPORT
OF MOTION FOR LEAVE
TO APPEAR AS AMICI
CURIAE**

NIYATI SHAH declares:

1. I am a member in good standing of the bar of this Court and the

Director of Litigation for Asian Americans Advancing Justice | AAJC. I am counsel

of record for proposed *amici curiae* Asian American Legal Defense and Education Fund, AAPI New Jersey, and Asian Americans Advancing Justice | AAJC (together, “proposed *amici curiae*”).

2. I make this declaration to place before the Court certain documents and facts in support of proposed *amici curiae*’s motion for leave to appear as *amici curiae* (the “motion for leave”).

3. On March 7, 2024, counsel for proposed *amici curiae* contacted counsel for the parties seeking their consent to the motion for leave.

4. Counsel for Plaintiffs indicated that Plaintiffs consent to the motion for leave.

5. No Defendants consented to the motion for leave. Only one Defendant’s counsel provided an explanation for their non-consent. That message, from counsel for Defendant Ripa, is attached hereto as **Exhibit 1**.

6. Counsel for Defendants Durkin, Ireland-Imhof, and Rajoppi requested that proposed *amici curiae* share a draft of the proposed brief, which request proposed *amici curiae* declined. Counsel for Defendant Hanlon indicated that his client would not consent, but that he did not intend to file an objection to the motion for leave.

7. Other than foregoing, counsel for proposed *amici curiae* did not receive responses from counsel for the Defendants regarding our request for consent to the motion for leave.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 12, 2024 in Washington, D.C.

s/ Niyati Shah
Niyati Shah